

Judge Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROMAN SELEZNEV,  
aka TRACK 2,  
aka ROMAN IVANOV,  
aka RUBEN SAMVELICH,  
aka nCuX,  
aka Bulba,  
aka bandysli64  
aka smaus,  
aka Zagreb,  
aka shmak,

Defendant.

CASE NO.: CR11-0070RAJ

**AFFIDAVIT OF ANNA GOYKHMAN,  
ESQ.**

I, Anna Goykhman, Esq., being an attorney admitted to practice law in the State of Washington and this District, and subject to the penalties for perjury, do hereby declare the following to be true and correct to the best of my knowledge:

1. I am the managing partner at the Law Office of Anna Goykhman, LLC.

AFFIDAVIT OF ANNA GOYKHMAN, ESQ

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Email: goykhmanlaw@gmail.com

1       2. This affidavit is made upon my own personal knowledge and describes my  
2 experiences while visiting the Defendant, Roman Seleznev, at FDC Seatac.  
3

4       3. On September 10, 2014, I placed a letter to Mr. Seleznev in the mail. The regular  
5 sized envelope was clearly marked indicating it was attorney-client confidential mail, and it was  
6 clearly marked that it should be opened in the presence of the client. On September 23, 2014, I  
7 learned that my letter to my client was delivered to him already opened.  
8

9       4. On September 17, 2014 I learned that Mr. Seleznev was moved out of the Special  
10 Housing Unit. I learned this from a staff member at FDC, Officer Erickson, who left me a  
11 voicemail message in response to my request to visit my client in the regular attorney visiting  
12 room wherein I would be able to have him sign documents and be able to hear him properly.  
13 The message I received was that when I came to see Mr. Seleznev, I would be seeing him in the  
14 regular attorney conference area of the FDC.  
15

16       5. On September 18, 2014, I arrived to meet with Mr. Seleznev. I was kept waiting  
17 for over one and a half hours in the lobby. I was then brought through security and informed I  
18 would be taken to the Special Housing Unit to meet with Mr. Seleznev in the no-contact room.  
19 Upon hearing my objection to this, and upon acknowledging that I was specifically told that I  
20 would be able to meet with my client in the attorney conference rooms, FDC staff contacted their  
21 chain of command. A person who looked like the Warden came downstairs and spoke with staff.  
22 The staff then informed me that I would only be able to see my client in the no-contact room and  
23 that I should contact "legal" if I have further objections.  
24

25       6. The no-contact room in the Special Housing Unit was, as it had been in the past,  
26 in the same condition. The microphone and speaker system through which I was supposed to  
27 communicate with the client intermittently cut out, making our communication almost  
28

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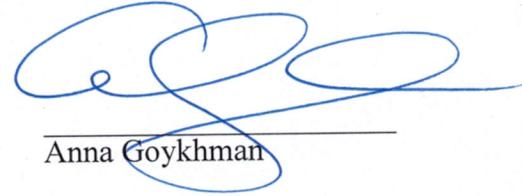
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1 impossible. I had to raise my voice and risk being overheard in our private conversation by staff.  
2 Furthermore, there was no way for me to share documents with my client, nor was there any way  
3 for my client to sign my documents.  
4

5       7. On September 24, 2014, I called the Federal Detention Center to inform the staff  
6 that I would need a contact room with my client so that I can go over legal documents with him  
7 and obtain signatures from him. I was told by FDC staff that would not be possible and that all  
8 visits, including legal visits, for this detainee, were to be in the no-contact room. I was informed  
9 this was a decision made by Captain Womeldorf.  
10

11       8. I next spoke with Assistant Warden Smith. I explained to Assistant Warden  
12 Smith that I need to meet with my client in a room where I can go over documents with him, and  
13 where I can have him sign documents. I explained to A.W. Smith that the no-contact room was  
14 unacceptable for proper attorney-client communication. A.W. Smith suggested that I "hand  
15 over" my documents to staff and that they will "deliver them" to my client for signature. I  
16 explained to him that there are documents that are privileged and that I have an objection to FDC  
17 staff having access to privileged documents. A.W. Smith told me "they won't read them." I  
18 asked A.W. Smith to tell me how many other detainees are restricted from having regular contact  
19 with their attorneys. A.W. Smith refused to answer my question. He told me he has no  
20 knowledge about why Mr. Seleznay is being denied access to counsel.  
21

22       9. I declare under penalty of perjury that the foregoing is true and correct. Executed  
23 on this 24<sup>th</sup> day of September, 2014 in Everett, Washington.  
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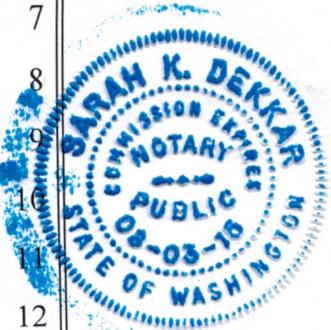
Anna Goykhman

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1  
2 Sworn to before me this 24<sup>th</sup> day of September, 2014  
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5 Notary Public  
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